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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RM-8626

In the Matter of RM-8626
Reply to Petition for Rulemaking
to Amend Part 97 of the Commissions Rules
to Eliminate Certain One-Way Communications
In the Amateur Radio Service Medium and High
Frequency Bands

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To: The Commission

Reply to Petition for Rulemaking

I, Vernon C. Jackson, oppose the Petition to Amend Part 97 of the Commissions Rules to eliminate the provisions which permit Amateur Radio Service Stations to transmit one-way Information bulletins and international morse code practice below 30 MHz. These stations continue to serve the Amateur community, especially the young, as well as a large number of older Amateurs, who lack the financial means to use the alternate means Mr. Maia mentions.

My background:

I, Vernon Jackson, have held the Amateur Advanced Class operator license since 1968, I also hold the First Class Commercial Radio telephone Operator License with Radar Endorsement, 1974-1979, I was a member of the Army Mars program 1975-1982. I have handled Health and Welfare traffic for the Red Cross following a tornado in Ohio in 1978, and worked communications in the St. Charles (MO) E.O.C. during the 1993 Flood.

I have been Net Control Station for the Gateway 160 meter Net, since its beginning in 1979. In June 1979, I began a live bulletin service "The Gateway 160 Meter Net Radio Newsletter" during the net, at the suggestion of net members. In 1986, the Voice Bulletin Services were expanded to 5 days per week, at the request of several regular check-ins and listeners to the net, to allow for propagation disturbances, varied personal schedules, etc.

Rebuttal

Mr, Maia states that he is concerned at "the level of anger that now exists on these bands when one way transmissions interrupt two-way communications that are already in progress." He states that this is manifested by deliberate attempts to interfere with or jam the one-way transmissions. First off, he is alluding to the "Turf Battle" existing on 3975 KHz on the 75 meter amateur band, between an on-air bulletin service began eight years ago, and several other

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groups of amateurs who claim priority on 3975 KHz by their use of this frequency for the past four or five decades. During the past several months, according to information I have received, several proposals have been offered by the bulletin service. Several were rejected by long term occupants of this frequency initially, but over the past month, several of the parties involved have taken steps to co-ordinate operation schedules, so as to achieve maximum utilization of 3975 KHz. This has not solved all problems, but certainly is a step in the right direction. Isolated cases of intentional interference, "jamming", unfortunately occur between users of all Amateur Service bands, in various operating pursuits including repeaters and contest stations, and a very tiny percentage of mal-contented and those who "have an axe to grind." These cases are by no means limited to one-way transmissions. Normally, when a bulletin station comes on a frequency to run bulletin transmissions, on a frequency which is already in use, the stations already using the frequency simply ignore the bulletin transmission, and continue their two-way transmissions. The anger referred to by Mr. Maia is basically in connection with the one channel on the 75 Meter band. In talking with other amateurs, they have not noticed any on-going problems on any other frequency on this or other Amateur bands.

As stated in Article 32 of the International Radio Regulations: "Radio communications between amateur stations..." can refer to either one-way or two-way exchanges of messages or information between amateur stations. The nationwide packet network is a recent example of this.

In 1987, there were Three Amateur Service Stations transmitting information bulletins on a regular basis on frequencies below 30 MHz; (WIAW; WA0RCR; KIMAN). In addition, two others provided space bulletins and Space Shuttle audio retransmissions on an occasional basis (WA3NAN; W5RRR). In 1995, one additional station KO4TA, has joined the list with voice bulletins in the form of a live two hour call-in program, with well known amateurs as guests. This station also operates on 3975KHz, along with the KIMAN Bulletin Service, and at least three nets, or groups of amateurs. WIAW provides voice teletype, and Morse code bulletins on two or three frequencies on 160, 75, 40, 20, 17, 15, 10 meter Amateur Bands throughout the day; as well as Morse code practice, seven days a week. This has been done for decades. KIMAN provides voice bulletins on one frequency on 75 and 20 meter Amateur bands, throughout the day, seven days a week, as they have done for the past eight years. WA0RCR provides a comprehensive voice bulletin service on one frequency on the 160 meter Amateur band; beginning in the afternoon when the band is largely un-occupied and continuing with bulletins through the evening, five days a week, as we have done for the last nine years, and on the Gateway 160 Meter Net for the past 16 years. This works very well, and provides maximum service possible on 160 meters, to the Amateur Community. This while avoiding the possibility of beginning a transmission when the channel is already in use. Those who want to listen in to a bulletin program know where to find it, and those who don't have

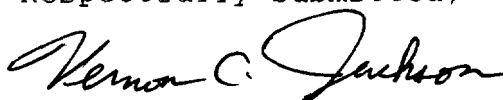
no problem finding another frequency. This has prevented the isolated problems that are mentioned in Fred Maia's Petition. The KO4TA bulletin service began around February 5, 1995; originally on Sunday Evening on the same time and channel as the KIMAN Bulletin Service. About one month ago the KO4TA Talk Program bulletin moved to Saturday Evening on 3975KHz. KIMAN canceled its bulletins on that frequency during the time the KO4TA bulletin service was operating on Saturday Evening.

My bulletin services on WA0RCR, "The Gateway Radio Newsletter", and "The Gateway 160 Meter Net Radio Newsletter", covers Eastern Missouri and Western Illinois during the day. At night, the signal on 1860 KHz covers 42 states and most of 6 Canadian provinces, from the Western Rockies to the Atlantic. Our bulletin service is the only outlet on a frequency below 30 MHz for two outstanding informational programs; "This Week In Amateur Radio", a 70 - 100 minute weekly program; and "The Houston AMSAT Information Net," a 55 minute weekly program. Both are carried by satellite on "The Omega Radio Network." Vast areas of North America are not served by Amateur Service VHF/UHF Stations above 30 MHz, carrying these bulletin services at all, let alone allowing for personal schedule limitations. We have received very positive response to our services airing on 160 meters, by letters and QSL cards received by mail; by talking with other Amateurs at "hamfests", etc. And especially from check-ins to "The Gateway 160 Meter Net," and other Two-way contacts, how much they enjoy and appreciate the service. Many reports they have listened to and benefitted from the bulletin service for many years and want to offer thanks for the efforts put into these operations. These free, timely, comprehensive, on-air reports help to keep Amateurs informed, regardless of their financial means. No wonder the commercial newsletter publishers are worried! For the sight-impaired amateur, on-air voice bulletins can keep them informed "on a par" with their sighted peers. (I have heard that there are around five thousand sight impaired amateurs here in the USA). In fact, some of the best programming aired on my station, comes from a sight-impaired Amateur, Hap Holly, KC9RP.

In conclusion:

The vast majority of Amateurs I have talked with, see nothing wrong with free on-air exchange of information between Amateurs, whether one-way, or two-way. They feel the Maia Petition, has blown the problem areas; yes there are some; way out of proportion, and completely distorted the big picture. To which I add: What is wrong with Amateur Service stations sharing ideas and information with other Amateurs across North America. on non commercial Amateur Service frequencies below 30 MHz?

Respectfully Submitted,



Vernon C. Jackson, WA0RCR